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October 27, 2015

U.S. EPA Region VII
EPA's Project Coordinator
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Missouri Department of Natural Resources
Hazardous Waste Program
Attn: Evan Bryant
P. O. Box 176
Jefferson City, MO. 65102-0176

The Doe Run Company
Transportation Compliance Manager
Attn: Cliff Asberry
P. O. Box 500
Viburnum, Mo. 65560

Subject: The Doe Run Resources Corporation – Paragraph 60c- Buick Mine and Mill

Enclosed please find report documents associated with the Third Party Audit conducted at the Buick Mine and Mill on September 28, 2015 pursuant to the amended "Modification of Administrative Order on Consent" paragraph 60.c. Audits.

If you have any further questions please feel free to contact me at 406-441-1475 or at nickeljc@cdmsmith.com.

Sincerely,

Jon Nickel
Project Manager, BCES, CHMM
CDM Smith

AWMD / WEMM
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RCRA



The Doe Run Company
Environmental Compliance
Audit Report

BUICK MINE AND MILL
270 FOREST ROAD 2231
HIGHWAY KK
BOSS, MO 65440

SEPTEMBER 28, 2015

Prepared for:
The Doe Run Resources
Corporation d/b/a The Doe
Run Company
St. Louis, MO



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Environmental Compliance Audit Report

This report documents the results of the environmental compliance audit conducted at The Doe Run Company ("Doe Run") facility located at 270 Forest Road 2231, Highway KK, Boss, Missouri (MO), on September 28, 2015. The report describes the process followed in performing the compliance audit. Appendix A presents general observations and a table with deviations observed along with recommendations, if any. Appendix B presents the audit forms for concentrate and ore trucks.

Scope and Objectives

This environmental compliance audit was conducted at the Doe Run Buick Mine and Mill facility. The Transportation Administrative Order on Consent (the "Transportation AOC") and related modification requires Doe Run to commission independent third-party audits to evaluate whether inspections and washing of all lead-bearing vehicles at each of the vehicle loading, unloading and wash stations are being conducted in accordance with the Transportation AOC. The Transportation AOC and modification requires that an audit be performed at each facility at least once every year and the audit report will be submitted to the Environmental Protection Agency and Doe Run.

The washing and inspection procedures to be audited are those relevant procedures contained in:

- *Doe Run Standard Operating Procedure for Washing and Inspection of Trucks Transporting Concentrate (July 2015)*
- *Standard Operating Procedure for Washing/Inspection of Vehicles Transporting Ore or Lead-Bearing Materials (July 2015)*

Facility Description

The Buick Mine and Mill is located at 270 Forest Road 2231, Highway KK in Boss, Missouri. The facility is located in a sparsely populated area of Iron County and Reynolds County, Missouri. Specifically, the Buick Mine and Mill is located at Latitude 37° 36' 24.23" N (degrees, minutes, seconds) and Longitude 91° 07' 36.51" W.

The Buick facility is a fully operational lead-zinc-copper mining and milling facility that produces lead, zinc and copper concentrate from underground mining operations for Doe Run. Milling operations are located aboveground. The primary SIC Code for the facility is 1031. The facility employs approximately 200 people and operates 24 hours per day, seven days per week. Personnel are on site continuously when the facility is operating. The facility includes the office building, warehouse, maintenance shop, crusher building, concentrate storage building, fuel and oil storage areas and underground mine workings.

Site Visit

The environmental compliance audit site visit included the following activities: brief tour of the vehicle transportation route on Doe Run property, inspection and evaluation of washing and inspection practices, document review, and exit briefing. The details of the audit site visit are summarized below:

Facility Audit Details

Facility Audited	Buick Mine and Mill: Wash Station for Ore Unloading, Concentrate Loading, Wash Station for Concentrate Loading
Date and Time of Audit	September 28, 2015; 2:30am
Date of Previous Third party Audit at this Facility	October 8, 2014; 2:30am
Standard Operating Procedures Audited	See Appendix B for Completed Audit Form
Final Audit Report date	October 23, 2015
Doe Run Official Receiving Audit Report	Cliff Asberry Transportation Compliance Manager The Doe Run Company P.O. Box 500 Viburnum, MO 65560

Environmental Compliance Audit Team Members and Responsibilities

Name	Company	Role
Bryant Lewis, CPEA, CHMM	CDM Smith	Lead Auditor
Michaela Bogosh, PE	CDM Smith	Auditor

Documents Reviewed

The following table presents the documents reviewed during the site visit.

Document	Dates	Author
Chain of Custody	6/1/2015 – 8/31/2015	Doe Run
Inspection Form for Trucks Transporting Concentrate	6/1/2015 – 8/31/2015	Doe Run
Pre-Operating Checklist – Wash Station for Vehicles Transporting Ore and Lead-Bearing Materials	6/1/2015 – 8/31/2015	Doe Run
Inspection and Wash Form for Vehicles Transporting Ore and Lead-Bearing Materials	6/1/2015 – 8/31/2015	Doe Run
Truck Wash Attendant Training Assessments	2015	Doe Run

Personnel Observed

The audit team spoke with and observed the following individuals during the site visit.

Name	Position	Action
Cliff Asberry	Transportation Compliance Manager	In-brief, ore unloading operations, concentrate loading operations, concentrate loading truck wash operations, exit brief
Larry Hampton	Truck Wash Attendant (Concentrate)	Concentrate truck wash operations
Greg Robinson	Concentrate Loader	Concentrate loading operations
Walter Barton	Concentrate Inspector	Concentrate loading operations
Eric Headrick	Truck Wash Attendant (Ore)	Ore unloading wash station operations
Allen Steimel	Superintendent	Exit brief

Findings

The third-party environmental compliance audit visit provides information regarding the facility's compliance with the washing and inspection Transportation-related SOPs based on observations by technical experts in the field of environmental compliance and auditing, interviews with facility personnel, and review of documents and records. Appendix A presents general observations and any deviations noted, a reference to the relevant SOP provision, the corresponding reference number on the audit form, and any explanation and/or recommendation, as well as any action taken by the facility. The audit forms are provided at Appendix B for the ore and concentrate trucks that reflect the specific SOP elements and observations by the auditor.

Certification

In accordance with paragraph 60(c) of the modification to the Transportation AOC, "the audit report shall contain a certification by the auditor similar to that found in paragraph 89 of this Order."

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: Bryant E. Lewis

Name: Bryant E. Lewis, CPEA, CHMM

Title: Lead Auditor

Date: October 23, 2015

Appendix A

Table of Findings

Compliance Audit Findings Summary

Doe Run Company

Buick Mine and Mill

September 28, 2015 – 2:30am

GENERAL OBSERVATIONS:

This audit of the concentrate loading and truck wash operations was conducted using the July 2015 revised Standard Operating Procedures. No deviations were found at the ore truck washing station.

The concentrate load operators are diligent in their load and inspection activities. In one instance, the inspector instructed a driver to patch a small hole found on the tarp with duct tape as an intermediate solution. When that did not work successfully, the inspector worked with the driver to remedy the hole with alternative material so that it was adequately patched prior to loading.

The concentrate loading wash station attendant was appropriately guiding truck drivers through the automatic wash and retention in the wash was appropriate. Thorough washing of all sides, back and wheels of trucks was completed.

DEVIATION NOTED:

Reference	Procedure Citation	Description	Location	Recommended Corrective Action *	Corrective Action
4	Operating Guidelines – SOP Appendix 3: Procedures for Wash Stations for Trucks Transporting Concentrate; Operation of Truck Wash (Routine Wash and Dry Cycles), 4.	When manual wash continues after the initial dry cycle has ended, the blowers are retriggered but trucks do not stay in the dry cycle for at least 40 seconds.	Concentrate Truck Wash Station	Ensure concentrate trucks are retained in the dry cycle for at least 40 seconds after blowers have been retriggered.	None at the time of the audit site visit.
5.1	SOP Washing and Inspection of Concentrate Trucks: Section 5.1, Appendix 1 - Pre-Operating Checklist for Wash Stations for Trucks Transporting Concentrate	The truck wash operator did not complete the Pre-Operating checklist and procedures prior to the start of the days shift and prior to trucks entering the wash.	Concentrate Truck Wash Station	Ensure that Pre-Operating procedures and checklist are completed prior to the start of the day's activities and that all trained operators are aware of this requirement.	Some Pre-Operation activities were completed after the start of the day's activities during the time of the audit site visit.

* Recommended corrective actions are for Doe Run's consideration but selection of the ultimate corrective action is the responsibility of Doe Run.

Appendix B

Audit Forms

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Date/Time	9/28/15 2:30 AM	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Deviation (explanation or reason)	If Deviation, Doe Run's action/resolution	Recommended Corrective Action
Weather	65F Degrees, Cloudy	502	504	508	502	510	504	508	502	510	504	508	502	510	504	508	502	510	504	508			
Location	Buick Mine and Mill	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #			
Type of Location	Ore Unloading Wash Station	502	504	508	502	510	504	508	502	510	504	508	502	510	504	508	502	510	504	508			
Auditor	B. Lewis, M. Bogosh																						
5.20	Operation of the Wash	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No		
a	Vehicle wait for signal to enter?	X		X		X		X		X		X		X		X		X		X			
b	Stop/go lights operating correctly?	X		X		X		X		X		X		X		X		X		X			
c	Truck in wash cycle >= 40 seconds?	X		X		X		X		X		X		X		X		X		X			
d	Truck in dry cycle >= 40 seconds?	X		X		X		X		X		X		X		X		X		X			
	Unload station	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No		
e	Paperwork complete?	X		X		X		X		X		X		X		X		X		X			
	Loading station	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No		
f	Tailgate and rim inspection performed?		X		X		X		X		X		X		X		X		X		X		
5.30	Tailgate and Rim Inspection	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No		
a	Rim of bed inspected?	NA		NA		NA		NA		NA		NA		NA		NA		NA		NA			
b	Loose material present?	NA		NA		NA		NA		NA		NA		NA		NA		NA		NA			
c	If yes, rim cleaning tool used to remove loose material?	NA		NA		NA		NA		NA		NA		NA		NA		NA		NA			
d	Tailgate securely latched with no gaps?	NA		NA		NA		NA		NA		NA		NA		NA		NA		NA			
e	Any leakage from around tailgate?	NA		NA		NA		NA		NA		NA		NA		NA		NA		NA			
f	Any "observable release" from the truck?	NA		NA		NA		NA		NA		NA		NA		NA		NA		NA			
g	Truck require unloading?	NA		NA		NA		NA		NA		NA		NA		NA		NA		NA			
h	Unloading performed?	NA		NA		NA		NA		NA		NA		NA		NA		NA		NA			
i	Paperwork properly completed?	NA		NA		NA		NA		NA		NA		NA		NA		NA		NA			
j	Form returned to the driver?	NA		NA		NA		NA		NA		NA		NA		NA		NA		NA			
5.60	Safety Guidelines for Operator (All day)	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No		
a	Was the operator wearing appropriate protective equipment?	X		X		X		X		X		X		X		X		X		X			
b	Did the operator stand clear of blowers, water lines, hoses and spray wands during operation?	X		X		X		X		X		X		X		X		X		X			
c	Did the driver remain in the vehicle during operation?	X		X		X		X		X		X		X		X		X		X			
d	Did the operator follow all applicable Doe Run safety rules and procedures as appropriate?	X		X		X		X		X		X		X		X		X		X			

Date/Time9/28/15 2:30 AM

Weather65F Degrees, Cloudy

LocationBuick Mine and Mill

Type of LocationOre Unloading Wash Station

AuditorB. Lewis, M. Bogosh

Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Deviation (explanation or reason)	If Deviation, Doe Run's action/resolution	Recommended Corrective Action
Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #			

	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No			
4.00	First Daily Inspection (before 1 st load)																										
a	Driver provide previous hauling day's inspection and wash form?																										
b	Form properly completed?																										
c	Form contain any bad ordered items?																										
d	If yes, bad orders remediated?																										
	Conduct First Daily Inspection																										
e	With vehicle bed/carriage elevated, any holes or visible contamination on undercarriage?																										
f	From ladder/platform, inspect tarp: tarp free from significant holes or tears?																										
g	From ladder/platform, inspect tarp: Tarp in correct position covering the bed?																										
h	From ladder/platform, inspect bed: Interior of truck bed inspected for visible holes?																										
i	(guidelines call for staying on "ladder/platform")																										
j	From ground level, exterior of truck inspected?																										
k	Tailgate secure and no gaps?																										
l	Air locks tight against tailgate?																										
m	Vertical bolts in place and secure?																										
n	Any evidence of ore leakage from the tailgate area?																										
o	Any defective conditions noted?																										
p	If yes, was truck loaded?																										
q	Appropriate steps taken? Placed Out of Service?																										
	Second daily inspection (after 4 th load and prior to last load)																										
r	With vehicle bed/carriage elevated, any holes or visible contamination on undercarriage?																										
s	From ladder/platform, inspect tarp: tarp free from visible holes or tears?																										
t	From ladder/platform, inspect tarp: Tarp in correct position covering the bed?																										
u	From ladder/platform, inspect bed: Interior of truck bed inspected for visible holes?																										
v	(guidelines call for staying on "ladder/platform")																										
w	From ground level, exterior of truck inspected?																										
x	Tailgate secure and no gaps?																										
y	Air locks tight against tailgate?																										
z	Vertical bolts in place and secure?																										
aa	Any evidence of ore leakage from the tailgate area?																										
bb	Any defective conditions noted?																										
cc	If yes, was truck loaded?																										
dd	Appropriate steps taken? Placed Out of Service?																										

Date/Time	9/28/15 2:30 AM	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Deviation (explanation or reason)	If Deviation, Doe Run's action/resolution	Recommended Corrective Action
Weather	65F Degrees, Cloudy	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #			
Location	Buick Mine and Mill																					
Type of Location	Ore Unloading Wash Station																					
Auditor	B. Lewis, M. Bogosh																					
5.00	Step Description – Wash procedures (ORE)	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No			
a	Wash station operator certified? Evidence?	X																				
b	Facility enclosed?	X																				
c	Facility designed to operate during all seasons of the year?	X																				
d	Facility near the exit of the facility property?	X																				
e	Facility has a backup wash system?	X																				
f	Power washer rated a minimum of 2200 psi?	X																				
5.10	Before Operation of Wash Station	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No			
a	Procedures in SOPs followed at the beginning of the day shift?																					
b	Start-up wash station	X																				
c	Run a wash cycle empty	X																				
d	Complete pre-operating checklist of the facility	X																				
e	Pre-operating checklist submitted to supervisor	X																				
f	Corrective actions noted and explained?	X																				
g	Determine wash station operability	X																				
5.50	Routine Cleaning of the Facility (3X per day)	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No			
a	Was the first 40 feet of roadway from the exit side of the Wash Station washed twice during the day and at the end of the day?	X																				
b	Was the wash performed properly?	X																				
5.60	Safety Guidelines for Operator (All day)	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No			
a	Was the operator wearing appropriate protective equipment?	X																				
f	Did the operator stand clear of blowers, water lines, hoses and spray wands during operation?	X																				
g	Did the driver remain in the vehicle during operation?	X																				
h	Did the operator follow all applicable Doe Run safety rules and procedures as appropriate?	X																				

Appendix B
DOE RUN - ORE AUDIT FORM

Date/Time:	9/28/15 2:30 AM	Truck #	502	Truck #	504	Truck #	508	Truck #	502	Truck #	510	Truck #	504	Truck #	508	Truck #	502	Truck #	510	Truck #	504	Deviation (explanation/reason; complete Appendix A)
Weather:	65F Degrees, Cloudy	Trailer #	502	Trailer #	504	Trailer #	508	Trailer #	502	Trailer #	510	Trailer #	504	Trailer #	508	Trailer #	502	Trailer #	510	Trailer #	504	
Location:	Buick Mine and Mill																					
Type of Location:	Ore Unloading Wash Station																					
Auditor:	B. Lewis, M. Bogosh																					
		Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
Step Description – Daily Truck Inspections (ORE)																						
4.0 First Daily Inspection (before 1 st load)																						
a	Did inspector review prior hauling day's inspection and wash form?	NA		NA		NA		NA		NA		NA		NA		NA		NA		NA		
Conduct First Daily Inspection																						
b	Did inspector observe the undercarriage with the trailer carriage elevated for any holes or visible contamination?	NA		NA		NA		NA		NA		NA		NA		NA		NA		NA		
c	Did the inspector observe the tarp from a ladder/platform for condition and position?	NA		NA		NA		NA		NA		NA		NA		NA		NA		NA		
d	Did the inspector observe the bed of the truck from a ladder/platform for any visible holes?	NA		NA		NA		NA		NA		NA		NA		NA		NA		NA		
e	From ground level was the exterior of the truck inspected including?	NA		NA		NA		NA		NA		NA		NA		NA		NA		NA		
g	sides	NA		NA		NA		NA		NA		NA		NA		NA		NA		NA		
h	tailgate	NA		NA		NA		NA		NA		NA		NA		NA		NA		NA		
i	air locks	NA		NA		NA		NA		NA		NA		NA		NA		NA		NA		
j	vertical bolts	NA		NA		NA		NA		NA		NA		NA		NA		NA		NA		
k	Were defective conditions/"Bad Order" ("BO") noted? If no, proceed to next section.	NA		NA		NA		NA		NA		NA		NA		NA		NA		NA		
l	If yes, was truck loaded?	NA		NA		NA		NA		NA		NA		NA		NA		NA		NA		
m	Appropriate steps taken? Truck placed Out of Service?	NA		NA		NA		NA		NA		NA		NA		NA		NA		NA		
Additional Comments:																						
Second daily inspection (after 4 th load and prior to last load)		Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
a	Did inspector observe the undercarriage with the trailer carriage elevated for any visible holes or visible contamination?	NA		NA		NA		NA		NA		NA		NA		NA		NA		NA		
b	Did the inspector observe the tarp from a ladder/platform for condition and position?	NA		NA		NA		NA		NA		NA		NA		NA		NA		NA		
c	Did the inspector observe the bed of the truck from a ladder/platform for any holes?	NA		NA		NA		NA		NA		NA		NA		NA		NA		NA		
d	From ground level was the exterior of the truck inspected including?	NA		NA		NA		NA		NA		NA		NA		NA		NA		NA		
e	sides	NA		NA		NA		NA		NA		NA		NA		NA		NA		NA		
f	tailgate	NA		NA		NA		NA		NA		NA		NA		NA		NA		NA		
g	air locks	NA		NA		NA		NA		NA		NA		NA		NA		NA		NA		
h	vertical bolts	NA		NA		NA		NA		NA		NA		NA		NA		NA		NA		
i	Were defective conditions/"Bad Order" ("BO") noted? If no, proceed to next section.	NA		NA		NA		NA		NA		NA		NA		NA		NA		NA		
j	If yes, was truck loaded?	NA		NA		NA		NA		NA		NA		NA		NA		NA		NA		
k	Appropriate steps taken? Truck placed Out of Service?	NA		NA		NA		NA		NA		NA		NA		NA		NA		NA		
Additional Comments:																						
5.1 Pre-Operation of Wash Station																						

Appendix B
DOE RUN - ORE AUDIT FORM

Date/Time:	9/28/15 2:30 AM	Truck #	502	Truck #	504	Truck #	508	Truck #	502	Truck #	510	Truck #	504	Truck #	508	Truck #	502	Truck #	510	Truck #	504	Deviation (explanation/reason; complete Appendix A)
Weather:	65F Degrees, Cloudy	Trailer #	502	Trailer #	504	Trailer #	508	Trailer #	502	Trailer #	510	Trailer #	504	Trailer #	508	Trailer #	502	Trailer #	510	Trailer #	504	
Location:	Buick Mine and Mill																					
Type of Location:	Ore Unloading Wash Station																					
Auditor:	B. Lewis, M. Bogosh																					
		Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
a	Complete Pre-Operating Checklist (SOP Appendix 2) for the Wash Station?	X		X		X		X		X		X		X		X		X		X		
Additional Comments:																						
5.2 Operation of Wash Station																						
a	Stop/go lights operating correctly?	X		X		X		X		X		X		X		X		X		X		
b	Truck in wash cycle >= 40 seconds?	X		X		X		X		X		X		X		X		X		X		
c	Truck in dry cycle >= 40 seconds?	X		X		X		X		X		X		X		X		X		X		
	Unload Station only																					
d	Paperwork complete?	X		X		X		X		X		X		X		X		X		X		
	Loading Station only																					
e	Tailgate and rim inspection performed?	NA		NA		NA		NA		NA		NA		NA		NA		NA		NA		
Additional Comments:																						
5.3 Tailgate and Rim Inspection																						
a	Rim of bed inspected?	X		X		X		X		X		X		X		X		X		X		
b	If material present, rim cleaning tool used?	X		X		X		X		X		X		X		X		X		X		
c	Tailgate checked to see if secure/any leakage?	X		X		X		X		X		X		X		X		X		X		
d	Paperwork completed?	X		X		X		X		X		X		X		X		X		X		
e	Form returned to the driver?	X		X		X		X		X		X		X		X		X		X		
Additional Comments:																						
5.4 Operation in Event of Automatic Wash Cycle Malfunction																						
a	Automatic wash cycle working properly?	X		X		X		X		X		X		X		X		X		X		
b	If yes, skip this section. If no, continue.	NA		NA		NA		NA		NA		NA		NA		NA		NA		NA		
c	Manual power washer used?		X		X		X		X		X		X		X		X		X		X	
d	Key vehicle components washed?																					
e	sides	NA		NA		NA		NA		NA		NA		NA		NA		NA		NA		
f	back	NA		NA		NA		NA		NA		NA		NA		NA		NA		NA		
g	wheels and tires	NA		NA		NA		NA		NA		NA		NA		NA		NA		NA		
h	wheel wells	NA		NA		NA		NA		NA		NA		NA		NA		NA		NA		
i	mudflaps	NA		NA		NA		NA		NA		NA		NA		NA		NA		NA		
j	undercarriage (unloading location only)	NA		NA		NA		NA		NA		NA		NA		NA		NA		NA		
k	tailgate	NA		NA		NA		NA		NA		NA		NA		NA		NA		NA		
l	Blowers triggered and truck retained in dry cycle for >=40 seconds?	NA		NA		NA		NA		NA		NA		NA		NA		NA		NA		
Additional Comments:																						

Appendix B
DOE RUN - ORE AUDIT FORM

Date/Time: 9/28/15 2:30 AM	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Deviation (explanation/reason; complete Appendix A)										
Weather: 65F Degrees, Cloudy	502	504	508	502	510	504	508	502	510	504											
Location: Buick Mine and Mill	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #											
Type of Location: Ore Unloading Wash Station	502	504	508	502	510	504	508	502	510	504											
Auditor: B. Lewis, M. Bogosh																					
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
6.0 Additional Documentation Review																					
		Date	Date	Date	Date	Date	Date	Date	Date	Date											
6.10	Select 5 days from a recent period and obtain the Pre-Operating Checklist to determine if form completed	9/15/2015	9/20/2015	9/22/2015	9/24/2015	9/28/2015															
6.30	For the days selected above, obtain the Inspection and Wash Form for Vehicles Transporting Ore and Lead-Bearing Material for the days to determine if form completed.	Y	Y	Y	Y	Y															
Additional Comments:																					
Audit Report Provided to:																					
Date:																					

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Date/Time August 28, 2015; 2:30 AM		Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Deviation (explanation or reason)	If Deviation, Doe Run's action/resolution	Recommended Corrective Action
Weather 65F Degrees, Overcast													
Location Buick Mine and Mill		Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #			
Type of Location Concentrate Loading, and Truck Wash Station													
Auditor B. Lewis, M. Bogosh													
5.60	Safety Guidelines for Operator												
a	Did the operator stand clear of blowers, water lines, hoses and spray wands during operation?												
b	Did the driver remain in the vehicle during operation?												
c	Did the operator <i>only use</i> the man doors and aisle ways, not walking between the vehicle and Wash Station exit door?												
5.70	Wipe Sampling												
a	Was the wipe sample performed in accordance with the Truck Wipe Sample Checklist?												
5.80	Documentation												
a	Operator complete the paperwork <i>after</i> the wash and inspection is completed?												

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Date/Time	August 28, 2015; 2:30 AM	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Deviation (explanation or reason)	If Deviation, Doe Run's action/resolution	Recommended Corrective Action
Weather	65F Degrees, Overcast	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #			
Location	Buick Mine and Mill																					
Type of Location	Concentrate Loading, and Truck Wash Station																					
Auditor	B. Lewis, M. Bogosh																					
5.00	Step Description – Wash procedures (Concentrate)	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No			
a	Wash station operator certified? Evidence?	X																				
b	Facility enclosed?	X																				
c	Facility designed to operate during all seasons of the year?	X																				
d	Facility near the exit of the facility property?	X																				
e	Facility has a backup wash system?	X																				
f	Power washer rated a minimum of 2200 psi?	X																				
g	Pre-operating checklist completed?		X																	Pre-operation checklist was not performed prior to the first truck of the day	Some of the Pre- Operation procedures were completed after approximately 9 trucks went through the wash, including power washing the first 70 feet of the exit side of the truck wash, but not all procedures were completed at the time of the audit site visit	Pre-operation checklist and procedures should be performed prior to the start of truck operation on that day
5.10	Before Operation of Wash Station																					
a	Procedures in SOPs followed at the beginning of the day shift?																					
b	Start-up wash station		X																			
c	Run a wash cycle empty		X																			
d	Complete pre-operating checklist of the facility		X																			
e	Pre-operating checklist submitted to supervisor		X																			
f	Corrective actions noted and explained?		X																			
g	Determine wash station operability		X																			
5.50	Routine Cleaning of the Facility (3X per day)																					
a	Was the first 70 feet of roadway from the exit side of the Wash Station washed twice during the day and at the end of the day?	X																				
b	Was the wash performed properly?	X																				
5.60	Safety Guidelines for Operator																					
a	Was the operator wearing appropriate personal protective equipment?	X																				

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Appendix B

DOE RUN - CONCENTRATE AUDIT FORM

[illegible]

Appendix B

DOE RUN - CONCENTRATE AUDIT FORM

[illegible]

Appendix B

DOE RUN - CONCENTRATE AUDIT FORM

[illegible]

Appendix B
DOE RUN - CONCENTRATE AUDIT FORM

Date/Time: August 28, 2015, 2:30 AM

Weather: 65F Degrees, Overcast

Location: Buick Mine and Mill

Type of Location: Concentrate Loading, and Truck Wash Station

Auditor: B. Kewis, M. Bogosh

Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Truck #	Deviation (explanation or reason); Complete Appendix A											
3207	128	380	215	3192	389	1243-13	378	3209	5031												
Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #	Trailer #												
7426	9507	0331	TT306	T13	6856	848	7410	84	438												
Yes		No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	

5.4 Truck Inspection at Wash Station

a	Operator inspect exterior of trailer:																				
b	sides	X		X		X		X		X		X		X		X		X		X	
c	tailgate	X		X		X		X		X		X		X		X		X		X	
d	grain door	X		X		X		X		X		X		X		X		X		X	
e	air locks	X		X		X		X		X		X		X		X		X		X	
f	wing nuts	X		X		X		X		X		X		X		X		X		X	
g	mudflaps	X		X		X		X		X		X		X		X		X		X	
h	tires and wheels	X		X		X		X		X		X		X		X		X		X	
i	(Brushy Creek only) From top of ladder, did the Operator inspect top of tarp for loose material? If yes, was the material removed?	NA		NA		NA		NA		NA		NA		NA		NA		NA		NA	
j	Was the truck subject to a Wipe Sample? (10% and all "Bad Order" trucks)	X		X		X		X		X		X		X		X		X		X	
k	Was the Wipe Sample performed?	X			X		X		X		X		X		X		X		X		
l	Was defective condition/"Bad Order" ("BO") noted? If no, proceed to next section.		X	NA		NA		NA		NA		NA		NA		NA		NA			X
m	Appropriate steps taken? Truck placed "Out of Service" and properly noted on Truck Inspection Form?	NA		NA		NA		NA		NA		NA		NA		NA		NA		NA	
Additional Comments:																					

Additional Documentation Review

	Date	Date	Date	Date	Date	Date	Date	Date	Date	Date	Date	Date	Date	Date	Date	Date	Date	Date	Date	Date	
6.10	Select 5 days from a recent period and obtain the Pre-Operating Checklist – Wash Station for Vehicles Transporting Concentrate for those days and verify they were completed.	6/4/2015	6/5/2015	6/17/2015	7/6/2015	7/10/2015	7/23/2015	8/13/2015	8/20/2015	8/26/2015											
6.30	For the days selected above, obtain the Inspection and Wash Forms for Vehicles Transporting Concentrate and verify they were completed.	X	X	X	X	X	X	X	X	X											
Additional Comments Concerning Procedures and/or Deviations:																					

Audit Report Provided to:
Date: